

oQUINN EMANUEL URQUHART & SULLIVAN, LLP

Charles K. Verhoeven (Bar No. 170151)

charlesverhoeven@quinnemanuel.com

David A. Perlson (Bar No. 209502)

davidperlson@quinnemanuel.com

Melissa Baily (Bar No. 237649)

melissabaily@quinnemanuel.com

John Neukom (Bar No. 275887)

johnneukom@quinnemanuel.com

Jordan Jaffe (Bar No. 254886)

jordanjaffe@quinnemanuel.com

50 California Street, 22<sup>nd</sup> Floor

San Francisco, California 94111-4788

Telephone: (415) 875-6600

Facsimile: (415) 875-6700

Attorneys for WAYMO LLC

UNITED STATES DISTRICT COURT

NORTHERN DISTRICT OF CALIFORNIA, SAN FRANCISCO DIVISION

WAYMO LLC,

Plaintiff,

vs.

UBER TECHNOLOGIES, INC.;  
OTTOMOTTO LLC; OTTO TRUCKING  
LLC,

Defendants.

CASE NO. 3:17-cv-00939-WHA

**DECLARATION OF ANDREA PALLIOS  
ROBERTS IN SUPPORT OF PLAINTIFF  
WAYMO LLC'S ADMINISTRATIVE  
MOTION TO FILE UNDER SEAL ITS  
PRÉCIS IN SUPPORT OF REQUEST TO  
FILE MOTION FOR AN ADVERSE  
INFERENCE JURY INSTRUCTION ON  
ACCOUNT OF DEFENDANTS'  
SPOILIATION**

1 I, Andrea Pallios Roberts, declare as follows:

2 1. I am licensed to practice in the State of California and am admitted to practice before  
3 this Court. I am an attorney at the law firm Quinn Emanuel Urquhart & Sullivan, LLP, counsel for  
4 the Plaintiff Waymo LLC ("Waymo"). I have personal knowledge of the matters set forth in this  
5 Declaration, and if called as a witness I would testify competently to those matters.

6 2. I make this declaration in support of Waymo's Administrative Motion to File Under  
7 Seal (the "Administrative Motion") information in its October 23, 2017 Précis In Support Of  
8 Request To File Motion For An Adverse Inference Jury Instruction On Account Of Defendants'  
9 Spoliation ("Précis Regarding Spoliation").

10 3. Waymo seeks to seal the highlighted portions of Waymo's Précis Regarding  
11 Spoliation because Defendants and/or Anthony Levandowski have designated the information  
12 confidential and/or highly confidential. Waymo expects Defendants and/or Anthony Levandowski  
13 to file one or more declarations in accordance with the Local Rules.

14 I declare under penalty of perjury under the laws of the State of California that the foregoing  
15 is true and correct, and that this declaration was executed in Redwood Shores, California, on October  
16 23, 2017.

17 By /s/ Andrea Pallios Roberts  
18 Andrea Pallios Roberts  
19 Attorneys for WAYMO LLC  
20  
21  
22  
23  
24  
25  
26  
27  
28

**SIGNATURE ATTESTATION**

Pursuant to Local Rule 5-1(i)(3), I attest under penalty of perjury that concurrence in the filing of this document has been obtained from Andrea Pallios Roberts.

/s/ Melissa J. Baily

Melissa J. Baily